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MCDONNELL DOUGLAS

CORPORATION

15 November 1983

United States Environmental
Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

ATTN: Mr. Robert L. Morby
Chief, Waste Management Branch

SUBJECT: McDonnell Douglas Corporation
EPA ID No.: MOD075888487 - St. Charles, Missouri
EPA ID No.: MOD000818963 - St. Louis, Missouri
EPA ID No.: OKD041501347 - Tulsa, Oklahoma

Dear Mr. Morby:

In response to your letter of 31 August 1983, the enclosed is hereby submitted to satisfy the requirements 40 CFR 264.151 (f). I have also included another copy of the independent certified public accountant's report on examination of financial statements for the latest completed fiscal year.

If you have any questions, please contact the undersigned at (314) 232-5145.

Sincerely,

J. Kevin Coyne
J. Kevin Coyne, Sr. Administrator
Corporate General Insurance

JKC:rjk

Enclosure



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RCRA RECORDS CENTER

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MCDONNELL DOUGLAS



14 November 1983

Regional Administrator
U. S. Environmental Protection Agency
Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Dear Sirs:

I am the principal financial officer of McDonnell Douglas Corporation, Post Office Box 516, St. Louis, Missouri 63166. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

McDonnell Douglas Corporation
EPA ID No. MOD000818963
P. O. Box 516
St. Louis, Missouri 63166

McDonnell Douglas Corporation
EPA ID No. OKD041501347
2000 North Memorial Drive
Tulsa, Oklahoma 74115

McDonnell Douglas Electronics Co., a
division of McDonnell Douglas Corporation
EPA ID No. MOD075888487
MO ID No. 01110
P. O. Box 426
St. Charles, Missouri 63301

The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H

of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

St. Louis Facility
\$248,200.
Tulsa Facility
\$3,434,300
St. Charles Facility
\$31,840

The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post closure care so guaranteed are shown for each facility:

None

In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

None

The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for the closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

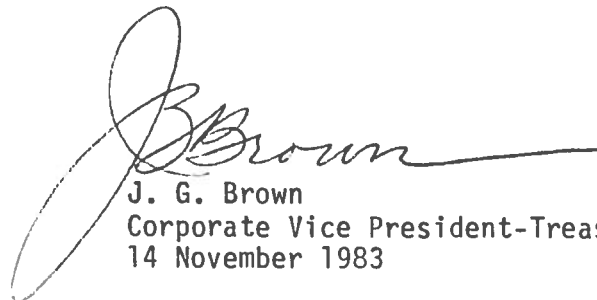
Part B. Closure or Post-Closure Care and Liability Coverage

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$	3,714,340
2. Amount of annual aggregate liability coverage to be demonstrated	\$	2,000,000
3. Sum of lines 1 and 2	\$	5,714,340
* 4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)		\$2,802,200,000.
* 5. Tangible net worth		\$1,783,800,000.
* 6. Net worth		\$1,819,600,000.
* 7. Current assets		\$3,278,800,000.
* 8. Current liabilities		\$2,731,900,000.
9. Net working capital (line 7 minus line 8)		\$ 546,900,000.
* 10. The sum of net earnings plus depreciation and amortization		\$ 395,400,000.
* 11. Total assets in U. S. (required only if less than 90% of assets are located in U. S.)	\$	N/A
	<u>Yes</u>	<u>No</u>
12. Is line 5 at least \$10 million?	X	
13. Is line 5 at least 6 times line 3?	X	
14. Is line 9 at least 6 times line 3?	X	
* 15. Are at least 90% of assets located in U. S.? If not, complete line 16.	X	
16. Is line 11 at least 6 times line 3?	X	

	<u>Yes</u>	<u>No</u>
17. Is line 4 divided by line 6 less than 2.0?	X	
18. Is line 10 divided by line 4 greater than 0.1?	X	
19. Is line 7 divided by line 8 greater than 1.5?		X

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below.



J. G. Brown
Corporate Vice President-Treasurer
14 November 1983

REPORT OF ERNST & WHINNEY, INDEPENDENT AUDITORS

Shareholders and Board of Directors
McDonnell Douglas Corporation
St. Louis, Missouri

We have examined the consolidated statement of financial position of McDonnell Douglas Corporation and consolidated subsidiaries as of 31 December 1982 and 1981, and the related consolidated statements of earnings, shareholders' equity and changes in financial position for each of the three years in the period ended 31 December 1982. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of McDonnell Douglas Corporation and consolidated subsidiaries at 31 December 1982 and 1981, and the consolidated results of their operations and the changes in their financial position for each of the three years in the period ended 31 December 1982, in conformity with generally accepted accounting principles applied on a consistent basis.

Ernst & Whinney

St. Louis, Missouri
27 January 1983